REMARKS

In the Office Action, the Examiner rejected claims 1-4, 13-17, 22, 25-27, and 30-34 under 35 U.S.C. §103(a) as being unpatentable over United States Patent 5,487,020, issued to Long ("Long") in view of United States Patent 6,822,640, issued to Derocher ("Derocher"). The Examiner further rejected claims 5, 12, 28, 29 under 35 U.S.C. §103(a) as being unpatentable over Long in view of Derocher, and in further view of United States Patent 5,363,477, issued to Kuragano, et al. ("Kuragano").

In this Amendment, Applicants have amended claims 1-4, 13-17, 22, 25-34. Applicants do not surrender any equivalents to any amended limitation. Applicants have added new claims 35-54. However, Applicants have not canceled any claim. Accordingly, claims 1-5, 12-17, 22 and 25-54 will remain pending after entry of this Amendment.

I.   Claims 1-5 and 12-17 rejected under 35 U.S.C. § 103

In the Office Action, the Examiner rejected claims 1-4, and 13-17 under 35 U.S.C. §103(a) as being unpatentable over Long ("Long") in view of Derocher. The Examiner further rejected claims 5 and 12 under 35 U.S.C. §103(a) as being unpatentable over Long in view of Derocher, and in further view of Kuragano. Claims 2-5 and 12-17 are dependent directly or indirectly on claim 1. Claim 1 recites a method of performing color correction on at least one image. The image includes several pixels. The method accepts a first vector input from a first color adjustment pad. The method adjusts color of pixels at a first luminance value in a color space of the image based on the accepted first vector input. The method adjusts color of pixels at another luminance value in the color space, in a manner related to a difference between the first luminance value and the other luminance value.

Applicants respectfully submit that Long, Derocher, Kuragano, neither individually nor through their hindsight, piecemeal combination, do not discloses, teaches, or suggests such a

method. Long describes a method for correcting colors of an image by using a set of reference colors on a single color wheel. *See* Long, column 4, lines 7-19; *see* also Figure 8. First, Long describes selecting colors in the <u>RGB, CYMK, HSV, or HLS color space</u>. Accordingly, <u>none of the color spaces described in Long is defined by a luminance value</u>. Second, Long describes <u>selecting</u> a first color and a second color on a color wheel. *See* Long, column 3, lines 51-53. Long does not describes accepting a first <u>vector input</u>. Third, Long does not describes a method that <u>adjusts</u> color of pixels <u>at another luminance value</u> in the color space, in a manner related to a <u>difference</u> between the <u>first luminance value</u> and the <u>other luminance value</u>.

As mentioned above, Long only describes changing a first color to a second color by selecting an original and a final color on a single color wheel. To change a third color to a fourth color, Long <u>requires</u> the user to <u>select</u> other original and final colors. Thus, Long requires <u>two selections</u> by the user in order to change two colors. Long does not describe a method where <u>one selection changes two or more colors</u>.

In contrast, claim 1 recites a method that (1) <u>accepts</u> a <u>first vector</u> input from a first color adjustment pad, (2) <u>adjusts</u> <u>color</u> of pixels at a <u>first luminance value</u> in a color space of the image <u>based</u> on the accepted <u>first vector</u> input, and (3) adjusts color of pixels at <u>another luminance value</u> in the color space, in a manner related to a <u>difference</u> <u>between</u> the <u>first luminance value</u> and the <u>other luminance value</u>.

Accordingly, Applicants respectfully submit that Long, Derocher, Kuragano, or its hindsight, piecemeal combination does not render claim 1 unpatentable. As claims 2-5 and 12-17 are dependent directly or indirectly on claim 1, Applicants respectfully submit that claims 2-5 and 12-17 are patentable over the cited references for at least the reasons that were discussed above for claim 1. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the § 103 rejection of claims 1-5 and 12-17.

II.   Claims 22 and 25-34 rejected under 35 U.S.C. § 103

In the Office Action, the Examiner rejected claims 22, 25-27, and 30-34 under 35 U.S.C. §103(a) as being unpatentable over Long ("Long") in view of Derocher. The Examiner further rejected claims 28 and 29 under 35 U.S.C. §103(a) as being unpatentable over Long in view of Derocher, and in further view of Kuragano. Claims 25-34 are dependent directly or indirectly on claim 22. Claim 22 recites a computer readable medium that includes a computer program for performing color correction on at least one image that includes several pixels. The computer program includes sets of instructions for accepting a first vector input from a first color adjustment pad. The computer program includes sets of instructions for adjusting color of pixels at a first luminance value in a color space of the image based on the accepted first vector input. The computer program includes sets of instructions for adjusting color of pixels at another luminance value in the color space, in a manner related to a difference between the first luminance value and the other luminance value.

Applicants respectfully submit that Long, Derocher, Kuragano, neither individually nor through their hindsight, piecemeal combination, do not discloses, teaches, or suggests such computer readable medium. As mentioned above, Long describes a method for correcting colors of an image by using a set of reference colors on a single color wheel. *See* Long, column 4, lines 7-19; *see* also Figure 8. First, Long describes selecting colors in the RGB, CYMK, HSV, or HLS color space. Accordingly, none of the color spaces described in Long is defined by a luminance value. Second, Long describes selecting a first color and a second color on a color wheel. *See* Long, column 3, lines 51-53. Long does not describes accepting a first vector input. Third, Long does not describes a method that adjusts color of pixels at another luminance value in the color space, in a manner related to a difference between the first luminance value and the other luminance value.

As mentioned above, Long only describes changing a first color to a second color by selecting an original and a final color on a single color wheel. To change a third color to a fourth color, Long <u>requires</u> the user to <u>select</u> other original and final colors. Thus, Long requires <u>two selections</u> by the user in order to change two colors. Long does not describe a method where <u>one selection changes two or more colors.</u>

In contrast, claim 22 recites a computer readable medium that includes a computer program with a set of computer instructions for (1) <u>accepting</u> a <u>first vector</u> input from a first color adjustment pad, (2) <u>adjusting</u> <u>color</u> of pixels at a <u>first luminance value</u> in a color space of the image <u>based</u> on the accepted <u>first vector</u> input, and (3) adjusting color of pixels at <u>another luminance value</u> in the color space, in a manner related to a <u>difference</u> <u>between</u> the <u>first luminance value</u> and the <u>other luminance value</u>.

Accordingly, Applicants respectfully submit that Long, Derocher, Kuragano, or its hindsight, piecemeal combination does not render claim 22 unpatentable. As claims 25-34 are dependent directly or indirectly on claim 22, Applicants respectfully submit that claims 25-34 are patentable over the cited references for at least the reasons that were discussed above for claim 22. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the § 103 rejection of claims 22 and 25-34.

III. New Claims 35-54

In this Amendment, Applicants have added new claims 35-54. Applicants respectfully submit that claims 35-54 are fully supported by the specification. Claims 35-54 are dependent directly or indirectly on claim 1. As claims 35-54 are dependent directly or indirectly on claim 1, Applicants respectfully submit that claims 35-54 are patentable over the cited references for at least the same reasons that were discussed above for claim 1.

Accordingly, Applicants respectfully submit that claims 35-54 are in condition for allowance.
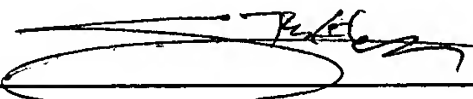
CONCLUSION

In view of the foregoing, it is submitted that the claims, namely claims 1-5, 12-17, 22 and 25-54 are in condition for allowance. Reconsideration of the rejections and is requested. Allowance is earnestly solicited at the earliest possible date.

Applicants believe that no additional fee is required for the submission of this amendment and response. However, in the unlikely event that the Commissioner determines that additional fee, extension and/or other relief is required, Applicants petition for any required relief including extensions of time. Moreover, Applicants authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 50-3804** referencing APLE.P0015.

Respectfully submitted,

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